

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:17CR356 RWS
	)	
PAUL CREAGER,	)	
	)	
Defendant.	)	

**RESPONSE TO MOTION TO MODIFY BOND CONDITIONS**

COMES NOW the United States of America, by and through Carrie Costantin, the Acting United States Attorney for this and her undersigned assistant and respectfully responds to the Defendant's motion to modify conditions of bond as follows:

*Travel*

The government does not object to allowing the Defendant to travel in Callaway County, Cole County, Miller County and Camden County in the Western District of Missouri for purposes of traveling to and attending to his residence near the Lake of the Ozarks without seeking specific authorization from the Pretrial Services office.

*Employment*

The government does not object to allowing the Defendant to be self-employed provided there be notification to any potential clients, investors or lenders with which the Defendant does business of the allegations set forth in the present case. The government will provide a proposed notice or will abide by any notice or form acceptable to the Pretrial Services office. In support of its position, the government states it could prove by reliable evidence, apart from the allegations

in the Indictment, that the Defendant has numerous ex-clients, ex-investors and ex-lenders who are in dire financial straits due to, at best, the Defendant's failure to perform on contracts, agreements and debt obligations arising from his self-employment over the last two years.

Respectfully submitted,

CARRIE COSTANTIN  
Acting United States Attorney  
/s/ Thomas C. Albus  
Thomas C. Albus #46224MO  
Assistant U.S. Attoreny

A true and correct copy of the foregoing was electronically served upon counsel for the Defendant this 17<sup>th</sup> day of August, 2017 by operation of the Court's filing system.

/s/ Thomas C. Albus